

Message

From: Hambrick, Amy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=787B0A3376944FCABAED4F018432CF44-AHAMBRIC]
Sent: 10/24/2018 1:44:57 PM
To: tyrone_barren@murphyoilcorp.com
Subject: re: Form submission from: Controlling Air Pollution from the Oil and Natural Gas Industry Contact Us about Controlling Air Pollution from Oil and Natural Gas Production form

Tyrone-

The reporting template is not yet finalized. Please note, while the CEDRI template is still considered draft, the reports are required to be submitted- this can be done by submitting it to your delegated authority or through CEDRI. CEDRI is available to accept the 60.5420a(b) and 60.5422a(a) and (b) reports. Because EPA's template on the website is still considered "draft", the requirement to submit only through CEDRI is not triggered, however during this time it seems most people are finding it easier to submit to CEDRI anyway. Once the report is "final" then CEDRI reporting is mandatory. Hence, in the meantime, the report still must be submitted, but the vehicle to do that is either submit to delegated authority or through CEDRI. Make sense?

So from the reg text, once the **[final]** form has been available in CEDRI for 90 days, submittal through CEDRI is required. Up to this 90 day marker, submittal can be either CEDRI or the delegated authority. Excerpt from the reg text FYI:

"You must submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>)). You must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI Web site (<https://www3.epa.gov/ttn/chief/cedri/>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in §60.4. Once the form has been available in CEDRI for at least 90 calendar days, you must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted."

Furthermore, as you may know, EPA just proposed reconsideration amendments to OOOOa (here: <https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/proposed-improvements-2016-new-source>) and along with these proposed changes EPA has updated the draft reporting template (see "announcements" on the CEDRI website here: <https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri>) . EPA is taking public comments until December 17, 2018 so please be sure to submit your comments on the reporting template and proposed amendments, the FR notice has instructions for how to comment.

I hope this is helpful,

Amy

Amy Hambrick
U.S. Environmental Protection Agency
(919)541-0964

From: drupal_admin@epa.gov <drupal_admin@epa.gov> on behalf of Tyrone Barren via EPA <no-reply@epa.gov>

Sent: Wednesday, October 17, 2018 2:17 PM

To: AirAction

Subject: Form submission from: Controlling Air Pollution from the Oil and Natural Gas Industry Contact Us about Controlling Air Pollution from Oil and Natural Gas Production form

Submitted on 10/17/2018 2:17PM

Submitted values are:

Name: Tyrone Barren

Email Address: tyrone_barren@murphyoilcorp.com

Comments: Is the final template available for the NSPS OOOOa Annual Compliance Report, and if so, where can I find it?